

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re FTX TRADING, LTD., <i>et al.</i> , ¹ Debtors.	Chapter 11 Case No. 22-11068 (JTD) (Jointly Administered)
AD HOC COMMITTEE OF NON-US CUSTOMERS OF FTX.COM, Plaintiff, v. FTX TRADING, LTD., <i>et al.</i> , Defendants.	Adv. Proc. No. 22-50514 (JTD)

**ORDER GRANTING AD HOC COMMITTEE OF NON-US CUSTOMERS OF
FTX.COM'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

Upon consideration of the *Ad Hoc Committee of Non-US Customers of FTX.Com's Motion for Partial Summary Judgment* (the "Motion");² and the Court having reviewed the Motion, the accompanying Opening Brief, the Quest Declaration, the Appendix, and any responses thereto; and this Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated as of February 29, 2012; and consideration of the Motion and the relief requested therein being a core proceeding in accordance with 28 U.S.C. § 157(b)(2); and venue being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion being adequate and appropriate under the circumstances; and

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification numbers are 3288 and 4063, respectively. Due to the large number of debtors in these chapter 11 cases, a complete list of the debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the debtors' claims and noticing agent's website at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms used but not defined herein are defined in the Motion or the Opening Brief.

upon the record of any hearing being held to consider the relief requested in the Motion; and upon all proceedings had before this Court; and this Court having determined that the legal and factual bases set forth in the Motion, the Opening Brief, the Quest Declaration and the Appendix establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED**.
2. Partial summary judgment is granted in favor of the Ad Hoc Committee on the Complaint under 28 U.S.C. § 2201.
3. A declaratory judgment is hereby entered as follows: the Debtors have no equitable interest in the Customer Assets under the plain and unambiguous Terms of Service and because the Customer Assets are held in trust.
4. The Ad Hoc Committee is authorized to take all actions necessary or appropriate to implement the relief granted in this Order in accordance with the Motion.
5. This Court retains exclusive jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Order.